

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA**

JEFFREY ALLEN,

Plaintiff,

v.

**R.J. CORMAN RAILROAD
SERVICES, LLC., and JOHN DOE,**

Defendants.

NOTICE OF REMOVAL

28 U.S.C. §§1441, 1442

AFFIDAVIT OF EDWARD QUINN III

I, Edward Quinn, III, being first duly sworn on oath, depose and state:

1. I hold the position of President of R.J. Corman Railroad Group, LLC.

In this position I am familiar with the operations, corporate structure, and corporate history of companies affiliated with the R.J. Corman Railroad Group, LLC and the R. J. Corman Living Trust. I am authorized to execute this affidavit on behalf R. J. Corman Railroad Services, LLC. I have personal knowledge of and testify to the statements below.

2. R. J. Corman Railroad Services, LLC (“Railroad Services”) is a limited liability company. The sole member of Railroad Services is R.J. Corman Railroad Group, LLC.

3. The sole member of R.J. Corman Railroad Group, LLC is the Richard J. Corman Living Trust, a traditional trust established under the laws of the State of Rhode Island.

4. All born and presently living beneficiaries of the Richard J. Corman Living Trust are individuals who are citizens of the Commonwealth of Kentucky.

5. The Richard J. Corman Living Trust consists of six trustees, five of which are individuals: John Morris, Sandra Adams, Jay Richard Corman, Shawna Corman Bramblett, and April Corman Colyer. Each individual trustee is a citizen of the Commonwealth of Kentucky. The sixth trustee is R.J. Corman Railroad Trust Company, LLC, a limited liability company.

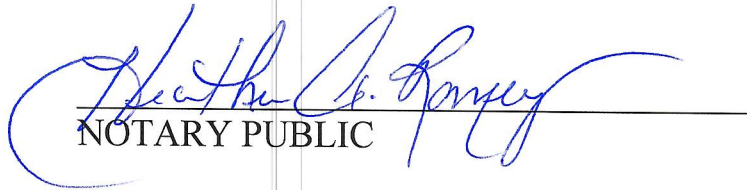
6. The members of the R.J. Corman Railroad Trust Company, LLC, are, and at all times relevant to removal of this action, John Morris, Sandra Adams, Jay Richard Corman, Shawna Corman Bramblett, and April Corman Colyer. All members are individuals and citizens of the Commonwealth of Kentucky.

FURTHER AFFIANT SAYETH NOT.


EDWARD QUINN III

STATE OF Kentucky)
COUNTY OF Jessamine)

SUBSCRIBED and SWORN to before me this 14th day of September 2023.


NOTARY PUBLIC

My commission expires: 6/2/2027

